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ENVIRONMENTAL

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RCRA PERMITS SECTION

FILE COPY

November 12, 1991

Ms. Cindy Gilder
Supervisor
Hazardous Waste Permits Section
Washington Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Re: Pier 91 Facility Part B Permit Application Revisions

Dear Ms. Gilder:

As communicated to you in a phone conversation October 23, 1991, Chempro's Operations Division has recently concluded that the current Pier 91 Facility Part B permit application should be revised to eliminate plans for expansion of the dangerous waste tank system east of the existing tank system known as the "small yard."

This change will not affect information that has already been reviewed by the agency regarding the types of wastes handled at the facility, storage and treatment processes, engineering designs, or operating plans. It is simply a change in the facility's proposed layout and a reduction in the proposed maximum capacity for dangerous waste management activities. The facility's Part B layout will still include plans to construct a designated loading/unloading area for dangerous wastes, as shown in the current permit application. The only change to the layout will be removal of the proposed tank system east of the existing small yard tank system.

We plan to submit necessary revisions to the permit application by Friday, November 22, 1991. The site layout drawings, tank tables, and text of Sections D (Process Information) and I (Closure Plan) will be subject to moderate revisions; minor revisions to several other sections will also be included. Again, I stress that these changes are related only to a revised layout, and I do not believe they will require more than cursory review by your staff or cause any delays in your current schedule for issuance of a draft Part B permit for public review.

We hope that this information can be incorporated into Ecology's fact sheet and any other materials issued for public review along with the draft Part B permit, to avoid discrepancies between our actual plans for the facility and the plans described to the public. We feel it is very important for regulatory agencies,

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USEPA RCRA



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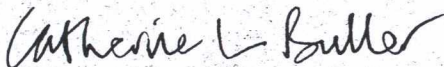
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citizens, and others to review a draft permit and permit application that reflect our most current plans for site layout and capacity, rather than previous layout plans and proposed capacities which overestimate the size of dangerous waste management areas at the Pier 91 Facility.

If you have any questions regarding the schedule or content of upcoming revisions, please contact Gary Kollman at (206) 223-0500. Gary is responsible for overseeing the permit application revisions, as well as review of the draft Part B permit once it is issued for public comment.

We appreciate your willingness to incorporate these revisions into the permit application prior to public review of the draft Part B permit. We are confident that the revisions will be provided to you swiftly, and will not delay your plans for issuing a draft permit for public review.

Sincerely,



Catherine L. Buller
Environmental Programs Manager

cc: Doug Brown, Ecology
Dave Aggerholm/Doug Hotchkiss, Port of Seattle
Carrie Sikorski, EPA
Gary Kollman, Burlington Environmental/Chempro